

Hearing Date: May 18, 2022, 9:30am (AST)

Objection Deadline: May 3, 2022, 4pm (AST)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: : **PROMESA**
: **Title III**
THE FINANCIAL OVERSIGHT AND :
MANAGEMENT BOARD FOR PUERTO RICO. : **Case No. 17-3283 (LTS)**
as representative of : **(Jointly Administered)**
THE COMMONWEALTH OF PUERTO RICO et al., :
Debtors¹. :

**MOTION TO FILE INSTANTER INTERNATIONAL SURVEILLANCE SERVICES
CORPORATION'S MOTION IN PARTIAL OPPOSITION TO AVOIDANCE
ACTIONS TRUSTEE'S MOTION TO ESTABLISH LITIGATION CASE
MANAGEMENT PROCEDURES [DKT. No. 42-1], AS FILED IN ADVERSARY
PROCEEDING 19-00202**

TO THE HONORABLE COURT:

COMES NOW INTERNATIONAL SURVEILLANCE SERVICES CORPORATION,
("ISSC"), Defendant herein, through the undersigned counsel and respectfully states and prays
as follows:

On May 3, 2022, ISSC filed a motion in partial opposition to the Avoidance Actions
Trustee's Motion to establish litigation case management procedures². See Adversary Proceeding
No. 19-00202 at Dkt. No. 50.

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² See Dkt. No. 20665 in case 17-3283 (LTS) & Dkt. No.42 in Adversary Proceeding No. 19-00202.

In synthesis, in said Motion ISSC requested that Trustee's (Plaintiffs) Motion at Dkt. No. 42-1 be DENIED IN PART. Specifically, ISSC requested in said motion that the Trustee's proposed litigation case management procedures be amended to reduce the proposed stay period from 120 days to 60 days and that the proposed mandatory mediation section of the procedures be eliminated.

In order to have the above-mentioned partial opposition as part of the main case, ISSC very respectfully request that the attached motion, as timely filed in Adversary Proceeding 19-00202, be considered in the hearing scheduled for May 18, 2022. **See Exhibit A.**

WHEREFORE, ISSC, very respectfully requests, that the attached motion (Exhibit A), as timely filed in Adversary Proceeding 19-00202, be considered at the hearing scheduled for May 18, 2022.

RESPECTFULLY SUBMITTED.

San Juan, Puerto Rico, this 4th day of May 2022.

I HEREBY CERTIFY that the foregoing motion was filed with the clerk of the US Bankruptcy Court for the District of Puerto Rico electronically using the CM/ECF system, which automatically serves notification of the filing to all parties in interest.

/s/ Nelson Robles Díaz
NELSON ROBLES-DIAZ LAW OFFICES, P.S.C.
SDCPR NO. 204410
Counsel for Defendant International Surveillance Services Corporation

P. O. Box 192302
San Juan, Puerto Rico 00919-2302
Tel.: (787) 294-9518
Fax: (787) 294-9519
E-mail: nroblesdiaz@gmail.com